

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

Regina Boston,)	
)	Case No. 3:21-cv-00464
Plaintiff,)	
)	
vs.)	
)	
IC System, Inc.,)	
)	
Defendant.)	
_____)	

**DEFENDANT I.C. SYSTEM, INC.'S GENERAL DENIAL
TO PLAINTIFF'S COMPLAINT**

COMES NOW, Defendant, I.C. SYSTEM, INC. ("Defendant" and/or "ICS"), and files this General Denial to the Plaintiff's Complaint simultaneously filed with Defendant's Motion to Dismiss Plaintiff's Complaint pursuant to Fed R. Civ. P 12(b)(6). ICS denies it violated the Fair Debt Collection Practices Act 15. U.S.C § 1692 *et. seq.*, (the "FDCPA") the N.C. Gen Stat. § 75-50, *et seq.* (the "NCDCA") or any other statute. Defendant further denies Plaintiff is entitled to the relief prayed for or any relief whatsoever. If this matter is not dismissed, Defendant reserves the right to file an amended answer or further response after discovery and investigation.

AFFIRMATIVE DEFENSES

Without waiving its right to amendment, Defendant asserts it is unable to identify affirmative defenses to Plaintiff's complaint as no factual allegations are pled in the Complaint.¹

WHEREFORE, Defendant, respectfully requests this Court deny any relief sought by Plaintiff, to DISMISS Plaintiff's claims with prejudice, and for any such other relief as this court deems just and proper.

¹ Defendant's Motion to Dismiss pursuant to Fed R. Civ. P 12(b)(6) addresses the lack of factual allegations in the in the Complaint.

Dated: September 10, 2021

Respectfully submitted,

/s/ Marissa A. Coyle

Marissa A. Coyle (N.C. Bar No. 42709)

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Counsel for Defendant IC System, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above will be sent via U.S. Mail on this 10th day of September, 2021, to the following recipient:

Regina Boston
c/o General Delivery
Charlotte, North Carolina 28204

Regina Boston
2870 Peachtree Road NW #19284
Atlanta, Georgia 30305

/s/ Marissa A. Coyle
Marissa A. Coyle
The Echols Firm, LLC